



HS&E CORPORATE SERVICES
Toxicology Department

201-14987

December 23, 2003

The Honorable Mike Leavitt, Administrator
U.S. EPA
P.O. Box 1473
Merrifield, VA. 22116

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Subject: Update - High Production Volume Chemicals Initiative

- CAS # 6294-34-4, Phosphonic acid, (2-chloroethyl)-, bis(2-chloroethyl) ester (BISCEP Monomer)
- CAS # 58823-09-9, Phosphonic acid, [2-[(2-chloroethoxy)(2-chloroethyl)phosphinyl]oxy]ethyl]-, bis(2-chloroethyl) ester (BISCEP Dimer)

Dear Administrator Leavitt:

As a continuing participant in the High Production Volume (HPV) chemical testing program, Rhodia Inc. is volunteering to support the generation and reporting of data for many HPV chemicals that we produce or import. We have joined consortia with other companies and volunteered individually to perform the tasks requested under the initiative.

Rhodia Inc. submits for review and public comment its test plan, as well as related robust summaries, for CAS # 6294-34-4, Phosphonic acid, (2-chloroethyl)-, bis(2-chloroethyl) ester (BISCEP Monomer), and CAS # 58823-09-9, Phosphonic acid, [2-[(2-chloroethoxy)(2-chloroethyl)phosphinyl]oxy]ethyl]-, bis(2-chloroethyl) ester (BISCEP Dimer), under the U.S. EPA's HPV Chemical Challenge Program. Please note that our test plan covers the monomer and dimer together as it represents the actual product being produced. Rhodia understands that there will be a 120-day review period for the test plan report and that all comments generated by or provided to EPA will be forwarded to Rhodia for consideration.

While we are voluntarily submitting study summaries of our data for the purposes of the HPV initiative, Rhodia considers the actual study reports and their associated data to be proprietary and does not allow anyone to use or cite them without our expressed written authorization.

I continue to serve as Rhodia Inc.'s technical contact for the HPV initiative. I can be reached at:

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Sincerely,

Glenn S. Simon, Ph.D., DABT
Director of Toxicology

Enclosures:

- HPV Test Plan
- Robust Study Summaries (IUCLID)

cc: Charles M. Auer, U.S. EPA
Barbara Leczynski, U.S. EPA
Jim Keith, American Chemistry Council (w/o attachments)
Paul Larson, Rhodia Inc.